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34 GOOGLE LLC

35 **UNITED STATES DISTRICT COURT**
36 **NORTHERN DISTRICT OF CALIFORNIA**
37 **SAN FRANCISCO DIVISION**

38 ANIBAL RODRIGUEZ, et al. individually and on
39 behalf of all others similarly situated,

40 Plaintiff,

41 vs.

42 GOOGLE LLC,

43 Defendant.

44 Case No. 3:20-CV-04688-RS

45 **JOINT STIPULATION RE: BRIEFING
46 ON MOTION TO DECERTIFY (DKT.
47 662) AND MOTIONS FOR JUDGMENT
48 AS MATTER OF LAW (DKT. 660, 661)**

49 Judge: Hon. Richard Seeborg
50 Courtroom: 3, 17th Floor

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”)
2 and Defendant Google LLC (“Google”), collectively referred to as the “Parties,” hereby enter into
3 this joint stipulation.

4 WHEREAS, on September 2, 2025, Google filed a motion to decertify the existing classes
5 in this matter (Dkt. 662);

6 WHEREAS, under Local Civil Rule 7-3, the default deadlines to file opposition and reply
7 briefs are September 16, 2025, and September 23, 2025, respectively;

8 WHEREAS, in light of the recently concluded trial, the Parties agree that a modest extension
9 of both deadlines is warranted;

10 WHEREAS, the Parties agreed that Plaintiffs will file their opposition to Google’s motion
11 to decertify no later than September 30, 2025, and Google will file its reply no later than October
12 14, 2025;

13 WHEREAS, the Parties each filed a motion for judgment as a matter of law pursuant to Rule
14 50(a) of the Federal Rules of Civil Procedure (Dkts. 660, 661); and

15 WHEREAS, the Parties agree that further briefing on the Rule 50(a) motions is unnecessary
16 as the court submitted the action to the jury and the jury returned a verdict, though the Parties may
17 renew their motions for judgment as a matter of law under Rule 50(b);

18 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
19 Parties:

- 20 (1) Plaintiffs’ opposition to Google’s motion to decertify is due September 30, 2025;
- 21 (2) Google’s reply in further support of its motion to decertify is due October 14, 2025; and
- 22 (3) The Parties will not submit further briefing on their Rule 50(a) motions for judgment as
23 a matter of law, but may renew their motions for judgment as a matter of law under Rule 50(b).

24 A Proposed Order is submitted concurrently herewith.

25 IT IS SO STIPULATED.

1 DATED: September 12, 2025

2 By: /s/ Mark C. Mao
3 Mark C. Mao

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5 *Attorneys for Plaintiffs*

6 DATED: September 12, 2025

7 COOLEY LLP

8 By: /s/ Jonathan Patchen
9 Jonathan Patchen

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11 *Attorneys for Google*

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FILER'S ATTESTATION

Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

DATED: September 12, 2025

BOIES SCHILLER FLEXNER LLP

/s/ Mark C. Mao
Mark C. Mao